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Chanda J. Berta, Clerk
U.S. DISTRICT COURT
NORTHERN DISTRICT OF INDIANA

Tyler Ray Schriber (Pro Se)

1932 Vinton Street

Lafayette, IN 47904

Telephone: (765) 337-0496

Email: Monty.Montgomery@gmail

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
HAMMOND DIVISION**

TYLER RAY SCHRIBER,

Plaintiff,

v.

Case No. 2:25-cv-00532-PPS-AZ

DEPUTY ALEX SLIGER, individually;

DEPUTY AUSTIN FARRELL, individually;

DEPUTY NICOLE DORNON, individually;

SERGEANT ROBERT LOOP, individually;

INVESTIGATOR JEFFREY CLARK, individually; and

**SHERIFF ROBERT GOLDSMITH, in his official capacity as Sheriff of Tippecanoe
County, Indiana,**

Defendants.

**FIRST AMENDED COMPLAINT
(42 U.S.C. § 1983; Fourth Amendment; Monell)
AND DEMAND FOR JURY TRIAL**

Plaintiff Tyler Ray Schriber, proceeding pro se, alleges as follows:

I. NATURE OF THE ACTION

1. This action arises from a pre-dawn law-enforcement operation at Plaintiff's home on June 5, 2025. Deputies were looking for Tanner Clugh, not Plaintiff. The operation escalated into a mistaken-identity K9 bite, Plaintiff's arrest and detention, and a later criminal case built from contradictory incident narratives that were reviewed, forwarded, and used without meaningful factual reconciliation.
2. Plaintiff alleges four connected constitutional injuries: (a) a warrantless rear-curtilage search posture at his fenced home; (b) the use of severe K9 force after officers had reason to know Plaintiff was not the suspect they sought; (c) Plaintiff's continued seizure, arrest, and detention after the Tanner-based premise materially collapsed; and (d) a later seizure through

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criminal legal process based on a generic, report-driven probable-cause affidavit and a Sheriff's Office review-and-forward pipeline that treated contradictory reports as "reviewed" and prosecutable.

3. Plaintiff also alleges municipal liability against the Sheriff in his official capacity. The Monell theory is not based on a bare label. It is based on a specific institutional mechanism: a standardized report-review and prosecutor-forwarding process that, in Plaintiff's incident file, permitted self-review, unreconciled contradictions, temporal and status anomalies, and later prosecutorial use without meaningful factual reconciliation.
4. This amended complaint is a complete standalone pleading and supersedes Plaintiff's original complaint in full.

II. JURISDICTION AND VENUE

5. This Court has subject-matter jurisdiction under 28 U.S.C. §§ 1331 and 1343 because Plaintiff asserts claims under 42 U.S.C. § 1983 and the Fourth and Fourteenth Amendments to the United States Constitution.
6. This Court has supplemental jurisdiction over related state-law claims under 28 U.S.C. § 1367.
7. Venue is proper in this District under 28 U.S.C. § 1391(b) because the events and omissions giving rise to these claims occurred in Tippecanoe County, Indiana, within the Northern District of Indiana.

III. PARTIES

8. Plaintiff Tyler Ray Schriber is an adult resident of Lafayette, Indiana and resided at the home described below.
9. Defendant Alex Sliger was, at all relevant times, a deputy sheriff with the Tippecanoe County Sheriff's Office ("TCSO") and the handler of police K9 "Csupak." He acted under color of state law and is sued in his individual capacity.
10. Defendant Austin Farrell was, at all relevant times, a deputy sheriff with TCSO. He acted under color of state law and is sued in his individual capacity.
11. Defendant Nicole Dornon was, at all relevant times, a deputy sheriff with TCSO. She acted under color of state law and is sued in her individual capacity.
12. Defendant Robert Loop was, at all relevant times, a sergeant with TCSO, functioning as a supervisor at the scene and later in the reporting chain. He acted under color of state law and is sued in his individual capacity.
13. Defendant Jeffrey Clark was, at all relevant times, a law-enforcement investigator with the Tippecanoe County Prosecutor's Office who executed the later probable-cause affidavit used to support criminal charges against Plaintiff. He acted under color of state law and is sued in his individual capacity.

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14. Defendant Robert Goldsmith is the elected Sheriff of Tippecanoe County, Indiana. He is sued in his official capacity only, as the final policymaker for TCSO law-enforcement operations, training, supervision, investigation, internal report approval, records workflow, discipline, and the report-review-and-forward process challenged in this action.

IV. FACTUAL ALLEGATIONS

A. The Residence, the early hour, and what Plaintiff was doing before the ambush

15. Plaintiff lived at and was present at 1932 Vinton Street, Lafayette, Indiana (the "Residence"), a corner-lot home with a fenced backyard and adjacent curtilage areas not open to the public.
16. The backyard and rear-side areas were enclosed and used for private domestic activity. They were not customary public approach routes, especially at pre-dawn hours.
17. At approximately 3:30 to 4:00 a.m. on June 5, 2025, it was dark and raining heavily.
18. Plaintiff and the other occupant, Scott, had been asleep in the basement area near the back of the house when the doorbell rang.
19. Plaintiff's dog was caged in the basement. After the doorbell rang, Scott went upstairs toward the front door while Plaintiff let the dog out of the cage, took the dog into the backyard, and began placing the dog on its yard lead.
20. Plaintiff was in his own fenced backyard handling his own dog and did not know deputies were at the front door speaking with Scott.
21. Plaintiff did not know Sliger was silently watching him from along the privacy-fence line. Plaintiff alleges that, before suddenly shouting, Sliger did not announce his presence while prowling and surveilling Plaintiff from the south-west privacy-fence side of the property.
22. Plaintiff alleges TCSO vehicles were staged in or near the driveway in an unlit or low-visibility posture, while additional law-enforcement vehicles and high beams were visible at the front of the house. Plaintiff further alleges Lafayette Police Department units were assisting in a perimeter role.
23. Plaintiff alleges there was no true suspect exigency justifying a stealth rear-curtilage ambush posture at his home.

B. Deputies focused on Plaintiff's home based on shifting information and took a stealth rear-curtilage position

24. Deputies were attempting to locate Tanner Clugh, not Plaintiff.
25. Defendants did not have an arrest warrant for Plaintiff, did not have a search warrant for Plaintiff's fenced curtilage, and did not have Plaintiff's consent to enter or occupy the fenced rear-curtilage area.
26. The only basis for focusing on Plaintiff's home was shifting, unverified information gathered from others earlier in the night.

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27. Before the pursuit began, Defendants' own reports already diverged materially about what the front-door occupant said.
28. Farrell reported that the front-door occupant, whom he identified as Scott Montgomery, said no one else was home, that Austin had been there earlier but was told to leave, and that Scott did not know Tanner.
29. Dornon identified the front-door occupant as Scott Cockrum according to his BMV photo and reported that he said Tanner was not there and was probably with Austin at 1411 Elizabeth Street.
30. Loop supplied a third version, writing that Scott said both Tanner and Austin had been at the house earlier and had been hanging out by the truck by the garage.
31. Those front-door accounts cannot all be true. They concern the foundational reason deputies focused on Plaintiff's home in the first place.
32. The reports also diverge about consent. Dornon wrote that when deputies asked to step inside and make sure Tanner was not there, the front-door occupant hesitated and did not answer. Loop later wrote that, after Plaintiff had already been seized, deputies searched the house with consent.
33. Plaintiff alleges deputies staged themselves around the Residence, including along the driveway and rear privacy-fence line, with unlit police SUVs and a stealth rear-curtilage posture while other deputies made contact at the front door.
34. Plaintiff alleges Sliger prowled silently along the privacy fence on the south and west side of the property, using his height and position to watch Plaintiff in the backyard without announcing his presence.
35. The use of a concealed rear-curtilage surveillance position, together with unlit vehicles staged around the driveway and property, made the situation materially different from an ordinary front-door knock-and-talk.
36. The factual basis for the operation was unstable before the chase even began because the reports conflict about who was present, whether Tanner was there, whether Scott even knew Tanner, and whether entry consent existed.

C. The front-porch identification of Plaintiff as Tyler

37. As Plaintiff moved past or near the front-porch line of sight during the initial confusion, one of the deputies at the front asked the homeowner, in substance, "Who's that?"
38. The homeowner replied, in substance, "That's my roommate Tyler."
39. Plaintiff alleges that one or more deputies heard that direct exculpatory identification, or at minimum that it was available to them before the seizure was completed.

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40. Plaintiff further alleges that this identification occurred before Farrell later yelled that the pursued person was not Tanner.
41. After the front-porch identification of Plaintiff as Tyler, Defendants could not reasonably continue to treat Plaintiff as Tanner Clugh absent some new and independent lawful basis for detention, force, arrest, or continued seizure.

D. Sliger's shifting identity story and the sudden armed confrontation at the gate

42. Plaintiff was not Tanner.
43. In Sliger's original narrative, he described seeing a male matching Tanner's description quickly exit the rear of the home, seeing Sliger in full uniform, and immediately running.
44. In Sliger's later supplement, however, he wrote that he first saw a male pacing in the rear and approaching outbuildings, and that he was not certain it was Tanner because of darkness, rain, and weather.
45. In that same supplement, Sliger wrote that he lost visual on the initial male, later saw another male attempting to hop the fence, and was unsure whether it was the same male or Tanner.
46. Sliger further wrote that he could only see the back of the male and only "ultimately determined" that the male was Tanner.
47. Plaintiff alleges that while Plaintiff was walking backward with his dog and approaching or opening the gate, Sliger quickly moved from his hidden surveillance position back around toward the outbuilding / driveway side where the unlit SUVs were parked and suddenly shouted loudly.
48. Plaintiff alleges he did not understand what was happening, saw Sliger's duty-issued firearm pointed at him, was shocked and terrified, and ran away from that immediate threat.
49. These shifting descriptions are materially inconsistent with any claim that Sliger had a clear, reliable identification of Plaintiff as Tanner at the moment commands were issued and force was deployed.

E. The real-time "not Tanner" correction, K9 friendly fire, and the bite to Plaintiff

50. Farrell, after closing distance and seeing the fleeing person's face and body, recognized that the person being chased was not Tanner and repeatedly yelled words to the effect of "It's Austin" and "It's not Tanner."
51. Dornon separately documented that she heard Farrell make that same correction and that she disengaged to avoid being bitten by the K9.
52. Loop likewise documented hearing Farrell say "It's Austin" multiple times.
53. Sliger later wrote that Farrell attempted to yell something, but that he could not understand it because he was in a full sprint.

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54. Thus, by Defendants' own reports, the identity of the pursued person was disputed in real time before the bite.
55. Despite the homeowner's front-porch identification of Plaintiff as Tyler, despite the lack of positive identification, and despite the "not Tanner" correction from other deputies, Sliger released K9 Csupak toward Plaintiff.
56. The deployment was chaotic and unsafe. Csupak first lunged and latched onto Deputy Farrell's outer carrier / vest. Sliger physically removed the dog from Farrell.
57. That first, unintended bite created a pause in which Sliger had the dog back under control and could reassess the situation.
58. After removing the dog from Farrell, Sliger nevertheless released or allowed Csupak to continue toward Plaintiff, and the dog latched onto Plaintiff's right upper arm / bicep, causing significant injury.
59. Plaintiff was unarmed and was bitten in a residential setting created by Defendants' mistaken-identity and stealth rear-curtilage search posture.
60. Plaintiff required emergency medical treatment at St. Elizabeth Hospital in Lafayette, Indiana and suffered pain, bleeding, scarring/disfigurement, emotional distress, and related damages.

F. Continued arrest, detention, and the later-hardened resisting narrative

61. After the bite and seizure, Plaintiff was handcuffed and treated as an arrestee.
62. Plaintiff disputes that he knowingly or intentionally fled from clearly identified law-enforcement officers after a clear and lawful order to stop. The encounter occurred in darkness and heavy rain, with deputies positioned behind the residence and within the fenced curtilage while searching for someone else, and Plaintiff was confronted by a suddenly emerging armed deputy with a K9.
63. Even if the initial pursuit began under a mistaken belief that Plaintiff might be Tanner, Plaintiff alleges that Defendants learned or reasonably should have learned during the encounter that Plaintiff was not Tanner, yet continued the seizure, bite, arrest, and detention anyway.
64. The homeowner's front-porch identification of Plaintiff as Tyler, together with the later "not Tanner" correction from other deputies, materially undermined any continuing Tanner-based basis for seizure.
65. Once that Tanner-based basis evaporated, Defendants lacked a separate lawful basis to continue arresting and detaining Plaintiff as Tyler Schriber.
66. Sliger's original narrative attributes to Plaintiff a detailed statement that Plaintiff heard "stop, police K9" loudly at least three times, ran because of an Ohio warrant, apologized for running, and said he knew he looked similar to Tanner.

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67. Dornon's later report describes a narrower hospital exchange in which Plaintiff said he understood that deputies believed he was Tanner and that he looked like Tanner, but it does not include the same detailed "heard warnings / ran because of Ohio" statement that Sliger used to justify the seizure.
68. Plaintiff alleges that any later-attributed statement about warnings or reasons for flight was inaccurate, incomplete, or extracted after Plaintiff had already been bitten, handcuffed, and was receiving medical treatment.
69. Later-acquired statements, later report-writing, and later approval of those reports could not retroactively create probable cause for the earlier bite, arrest, or detention.

G. CAD / RMS anomalies, BWC issues, review-chain collapse, and forwarding to prosecutors

70. TCSO uses standardized incident-reporting forms containing "Signed," "Reviewed," and "Forward to Prosecutor's Office for review" steps.
71. The Sheriff's Office CAD / RMS records for this incident contain temporal and status anomalies on their face.
72. The call report reflects that the event was created at approximately 03:42:28, that "he's trying to run" was entered at approximately 03:52:46, that "k9 lose" was entered at approximately 03:53:29, that "one detained" was entered at approximately 03:54:13, that "medics sig10" was entered at approximately 03:55:02, and that "k9 apprehension" was entered at approximately 03:56:02.
73. Thus, the encounter compressed into roughly three minutes from "he's trying to run" to "k9 apprehension," and the CAD sequence appears out of order on its face because "one detained" and "medics" appear before "k9 apprehension."
74. The same CAD record later notes at approximately 05:26:06 that "BWC is almost 10-0," and at approximately 07:15:37 that Tyler was remanded to jail staff.
75. Plaintiff does not ask the Court at this stage to decide exactly what each CAD / RMS field means. Their significance is that the file does not present a clean, seamless, contemporaneous chronology, yet it was nevertheless treated as reviewed, forwarded, and reliable.
76. The incident summary further appears to mark Resisting Law Enforcement, Warrant Service, and Canine (K9) Deployment as "Cleared by Arrest" at approximately 03:42 Hrs, essentially the moment the call opened and before the chase / bite sequence reflected in the CAD narrative unfolded.
77. Plaintiff does not allege at this stage exactly whether those fields were automatically generated, later normalized, or manually coded. Plaintiff alleges only that the file contains administrative status markers that do not read as a straightforward live chronology, including a "Warrant Service — Cleared by Arrest" entry even though Plaintiff was not arrested on a

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warrant, and that those markers support the inference that the file was processed as an administratively certified arrest package rather than neutrally reconciled as a disputed use-of-force incident.

78. In Plaintiff's incident file, Sgt. Loop's supplement reflects self-review: he is listed as both the signatory and the reviewer.
79. Administrative Assistant S. Black created the entry reading "Forward to Prosecutor's Office for review" and is likewise listed as both the signatory and the reviewer of that forwarding step.
80. On information and belief, S. Black held the Sheriff's Office Secretary / COMOT IV role and worked within the Sheriff's administrative chain.
81. Lieutenant C. Black reviewed the Farrell, Dornon, and Sliger supplements even though those supplements contained material contradictions about what the front-door occupant said, whether the fleeing person was "not Tanner," and the sequence of the K9 deployment.
82. The incident file therefore reflects a review-chain collapse rather than meaningful supervision: contradictory narratives were approved and forwarded without reconciliation.
83. Body-worn camera evidence existed. Dornon's report references her BWC identifier and photo uploads to Evidence.com. Loop expressly directed readers to "all body camera video related to this case." CAD remarks further reflected that Sliger's body camera was "almost 10-0" during critical moments. Despite the centrality of that evidence, the file does not reflect a meaningful independent review before the incident package was adopted and forwarded.

H. Bond, delayed charging, the generic probable-cause affidavit, and favorable termination

84. After being bitten and treated, Plaintiff was transported to the Tippecanoe County Jail.
85. A jail Current Offender Court Information Report generated on June 5, 2025 listed "Resisting Law Enforcement," a bond amount of \$250.00, and an initial court appearance date of July 30, 2025 at 8:30 a.m. in Tippecanoe Superior Court 7.
86. Plaintiff posted the \$250 bond and was released with written warning that a warrant would issue if he failed to appear.
87. Plaintiff appeared in court as ordered on July 30, 2025. On information and belief, no Information had yet been filed, no timely probable-cause determination had been made in Plaintiff's presence, and Plaintiff was given no clear explanation of his legal status while he remained under threat of rearrest.
88. On September 2, 2025, in Tippecanoe Superior Court 7, Cause No. 79D07-2509-CM-001681, the State filed an Information charging Plaintiff with three counts of resisting law enforcement (fleeing), one count tied to each of Sliger, Dornon, and Farrell.
89. Defendant Clark executed the probable-cause affidavit supporting those charges and dated it August 29, 2025.

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90. The affidavit does not set out a case-specific reconciliation of the disputed facts. Instead, it states in generic terms that the affiant “he/she” examined the reports, that the officer “he/she/they” investigated or arrested Plaintiff, and that the officer reports are “credible and reliable” because they were written by law-enforcement officers in the course of their duties.
91. The affidavit therefore reads as a generic, report-driven form or template rather than an individualized, evidence-based probable-cause determination.
92. The later probable-cause affidavit and charging decision omitted the homeowner’s direct front-porch identification of Plaintiff as “my roommate Tyler,” even though that fact directly undermined any continuing premise that Plaintiff was Tanner Clugh.
93. Rather than independently resolving the mistake, the later report-writing, review, and forwarding process hardened a mistaken-identity street encounter into a prosecutable resisting narrative.
94. Plaintiff was thereby subjected to seizure through criminal legal process, including bond, court-appearance obligations, and the continuing threat of criminal sanction and custody.
95. On November 7, 2025, the State moved to dismiss and the court dismissed / nolle prosequied all counts and ordered bond released. The criminal proceedings therefore terminated in Plaintiff’s favor.

I. Damages

96. As a direct and proximate result of Defendants’ actions, Plaintiff suffered physical injury, medical expenses, pain and suffering, scarring / disfigurement, emotional distress, loss of liberty, reputational harm, and the burdens of criminal prosecution.
97. Plaintiff has also suffered continuing anxiety and fear associated with being silently surveilled at his own home, confronted at gunpoint, bitten by a police dog, and then processed into a criminal case built on contradictory reports and a generic probable-cause affidavit.

V. CLAIMS FOR RELIEF

COUNT I – 42 U.S.C. § 1983 (Fourth Amendment)

Unreasonable Search of Curtilage

(Against Sliger, Farrell, Dornon, and Loop)

98. Plaintiff incorporates paragraphs 15 through 33.
99. The Fourth Amendment protects the home and its curtilage from unreasonable searches. See *Florida v. Jardines*, 569 U.S. 1, 6-7 (2013); *United States v. Dunn*, 480 U.S. 294, 300 (1987).
100. Defendants used the fenced rear curtilage of Plaintiff’s home at pre-dawn hours to conduct an investigative search for another person.
101. Defendants lacked a search warrant, lacked valid consent, and lacked exigent circumstances justifying a stealth rear-curtilage search posture with a K9.

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102. Defendants' rear-curtilage staging and search violated Plaintiff's Fourth Amendment rights.

COUNT II – 42 U.S.C. § 1983 (Fourth Amendment)

Excessive Force (K9 Deployment / Dog Bite) and Failure to Intervene

(Against Sliger; and against Farrell, Dornon, and Loop for failure to intervene)

103. Plaintiff incorporates paragraphs 34 through 58.

104. Excessive-force claims are governed by the objective-reasonableness standard announced in *Graham v. Connor*, 490 U.S. 386, 396-97 (1989).

105. Defendant Sliger seized Plaintiff and used significant force by releasing or maintaining a police K9 to bite and apprehend him.

106. The K9 bite constituted intermediate-to-severe force capable of causing serious bodily injury.

107. The force was objectively unreasonable under the totality of the circumstances, including: (a) mistaken identity and lack of positive identification; (b) the homeowner's direct identification of Plaintiff as Tyler; (c) on-scene communication that the subject was not Tanner; (d) the residential setting and lack of immediate threat to officers; (e) the unsafe deployment evidenced by the dog first biting Deputy Farrell's outer carrier; (f) the opportunity to reassess after removing the dog from Farrell; and (g) the availability of less injurious alternatives.

108. Defendant Sliger's actions violated Plaintiff's Fourth Amendment right to be free from unreasonable force.

109. Defendants Farrell, Dornon, and Loop knew or should have known that excessive force was being used and, to the extent they had a realistic opportunity to intervene or stop / call off the deployment, failed to do so.

COUNT III – 42 U.S.C. § 1983 (Fourth Amendment)

Unreasonable Continued Seizure, Arrest, and Detention Without Probable Cause

(Against Sliger, Farrell, Dornon, and Loop)

110. Plaintiff incorporates paragraphs 59 through 69 and 85 through 96.

111. Defendants seized, arrested, and detained Plaintiff while characterizing the event as resisting law enforcement by fleeing.

112. Even if the initial pursuit began under a mistaken belief that Plaintiff might be Tanner, Plaintiff plausibly alleges that Defendants learned or reasonably should have learned during the encounter that Plaintiff was not Tanner, yet continued the seizure, bite, arrest, and detention anyway.

113. The homeowner's front-porch identification of Plaintiff as Tyler, together with the later "not Tanner" correction from other deputies, materially undermined any continuing Tanner-based basis for seizure.

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- 114. Once that Tanner-based basis evaporated, Defendants lacked a separate lawful basis to continue arresting and detaining Plaintiff as Tyler Schriber.
- 115. Later-attributed statements in the hospital and later report-writing could not retroactively create probable cause for the earlier bite, arrest, or detention.
- 116. Defendants' continued seizure, arrest, and detention of Plaintiff violated the Fourth Amendment.

COUNT IV – 42 U.S.C. § 1983 (Fourth Amendment)

Unreasonable Seizure Pursuant to Legal Process Without Probable Cause

(Against Clark; and against Sliger, Farrell, Dornon, and Loop to the extent they caused or continued the prosecution)

- 117. Plaintiff incorporates paragraphs 70 through 96.
- 118. A pretrial seizure caused by legal process unsupported by genuine probable cause violates the Fourth Amendment. See *Manuel v. City of Joliet*, 580 U.S. 357, 367-70 (2017). Material falsehoods and omissions also matter to the probable-cause inquiry. See *Franks v. Delaware*, 438 U.S. 154, 155-56 (1978).
- 119. Defendants caused Plaintiff to be seized pursuant to legal process through the initiation and continuation of criminal charges.
- 120. The later Information charged three resisting-by-fleeing counts, increasing leverage and exposure.
- 121. Defendant Clark executed a probable-cause affidavit that relied on officer-report credibility rather than an independent assessment of the contradictory facts and available evidence.
- 122. The later criminal legal process lacked genuine probable cause, or at minimum included counts and factual assertions unsupported by probable cause, because Defendants' own records contained misidentification warnings, contradictory front-door accounts, the homeowner's direct identification of Plaintiff as Tyler, and a chaotic rear-curtilage scenario inconsistent with clear lawful identification-and-stop allegations for each charged count.
- 123. The affidavit's generic "he/she/they" formatting and officer-credibility template further support the inference that the later legal process was report-driven and boilerplate rather than individualized and evidence-based.
- 124. Defendants' conduct included material omissions and false or misleading attributions designed to justify the K9 use of force and shift blame to Plaintiff.
- 125. The criminal case terminated in Plaintiff's favor.
- 126. Plaintiff suffered damages as a result of the prosecution and the restrictions and burdens it imposed.

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COUNT V – 42 U.S.C. § 1983 (Monell)

**Municipal Liability – Policies, Customs, Failure to Train / Supervise, and Ratification
(Against Goldsmith in his official capacity)**

127. Plaintiff incorporates paragraphs 70 through 96.
128. Municipal liability may arise from an official policy, a widespread custom, or a decision attributable to a final policymaker. *Monell v. Dep't of Soc. Servs.*, 436 U.S. 658, 690-91 (1978); *Pembaur v. City of Cincinnati*, 475 U.S. 469, 481-84 (1986).
129. Under Indiana law, the county sheriff is the final policymaker for law enforcement in his jurisdiction. See *Eversole v. Steele*, 59 F.3d 710, 716 (7th Cir. 1995); see also Ind. Code §§ 36-2-13-5, 36-2-16-3.
130. Plaintiff does not allege that Sheriff Goldsmith controlled the prosecutor's independent charging decision. Plaintiff alleges instead that Goldsmith is the final policymaker for TCSO's law-enforcement operations, use-of-force reporting and review, internal investigative approval workflows, records-control practices, and sheriff-office referral practices that foreseeably shaped the later affidavit-and-charging process.
131. Plaintiff further alleges that because Sheriff Goldsmith is the final policymaker for TCSO's law-enforcement operations, use-of-force review, records-control practices, internal investigative approval workflows, and sheriff-office referral practices, municipal liability may arise here not only from a widespread custom, but also from a policymaker-directed, policymaker-approved, or policymaker-ratified course of action within those functions. This complaint therefore pleads both a standardized-process custom theory and a final-policymaker decision / ratification theory.
132. This Monell theory is not based on a bare label or solely on Plaintiff's injury. It is based on a standardized internal process. At the pleading stage, a plaintiff may plausibly allege a widespread practice by identifying a standardized process without naming every other victim. See *White v. City of Chicago*, 829 F.3d 837, 844-45 (7th Cir. 2016).
133. The constitutional violations alleged above were caused by, and were the foreseeable result of, TCSO policies, customs, and practices, including at least two interlocking systems described below.
134. First, TCSO maintained and enforced a policy, custom, or practice permitting K9 apprehension force in mistaken-identity or uncertain-identification situations, without requiring positive identification and without robust call-off safeguards when officers communicated misidentification or loss of target certainty.
135. TCSO failed to train and supervise K9 handlers and assisting deputies to prevent mistaken-identity dog bites and to implement clear, enforceable identification, spacing, and call-off rules, despite the obvious high risk of severe injury.
136. Second, TCSO maintained a standardized reporting workflow that, as a matter of routine practice: (a) permits self-review; (b) treats "review" as a checkbox rather than meaningful

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constitutional-compliance scrutiny; (c) allows contradictory narratives to remain unreconciled within the same incident package; (d) allows administrative closure/status coding to function as a substitute for factual reconciliation; and (e) forwards incident narratives to prosecutors without independent evidentiary verification, including meaningful BWC review, when force and identity are disputed.

137. Because this report-review and forwarding pipeline is part of the Sheriff's Office's routine system for processing incident narratives and use-of-force reports, the same workflow necessarily applies to numerous incidents beyond Plaintiff's own case and therefore plausibly constitutes a widespread institutional practice rather than an isolated occurrence.
138. The complaint further plausibly alleges ratification. Supervisory personnel reviewed and approved incident narratives despite contradictory accounts, temporal / status anomalies, and the known misidentification of Plaintiff. By approving and forwarding those narratives for prosecution without correction, the Sheriff's Office effectively adopted the conduct as acceptable.
139. The later probable-cause affidavit and charging decision illustrate how the pipeline operated in practice: instead of independently resolving contradictions in the incident file, the later legal process adopted officer narratives as "credible and reliable" because they were written by law enforcement, thereby converting the Sheriff's Office's internal rubber-stamp review into prosecutorial action.
140. Plaintiff further alleges that the Sheriff's Office review-and-forwarding pipeline did not function as an independent truth-checking system. Instead, it approved and transmitted an incident package containing unreconciled contradictions, self-review, identity uncertainty, and temporal / status anomalies. On information and belief, the forwarding step performed by Administrative Assistant S. Black occurred within the Sheriff's Office administrative chain, further supporting the inference that the prosecutor-forwarding step was part of the Sheriff's Office's ordinary internal workflow.
141. The same file contained "Reviewed" signoffs, self-review, and CAD / RMS markers such as "Cleared by Arrest" and "Warrant Service — Cleared by Arrest" even though Plaintiff was not arrested on a warrant. Plaintiff alleges that this system treated administrative closure codes and review signoffs as substitutes for factual reconciliation, thereby converting a disputed and contradictory use-of-force event into a reviewed and prosecutable case file.
142. The Clark affidavit's generic form language, including its use of generic pronouns and a credibility template rather than an individualized factual narrative, further supports the inference that the Sheriff's Office referral package and the later affidavit process operated through standardized, repeatable boilerplate rather than a case-specific truth-checking review.
143. Plaintiff further alleges that public federal litigation involving the same Sheriff's administration supports a plausible, investigation-worthy inference that Tippecanoe's force-

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accountability ecosystem may be structurally vulnerable to biased narrative management rather than neutral constitutional review. In *Martin v. Goldsmith*, No. 23-2277 (7th Cir. Dec. 31, 2025), the Seventh Circuit expressly recounted allegations accepted as true at the pleading stage that, after Martin reported deputies for campaigning for Sheriff Goldsmith while in uniform, Sheriff Goldsmith replaced internal-affairs administrative personnel with politically loyal officers, assigned an investigator with a retaliatory motive, manipulated the merit board, issued humiliating press releases, and coordinated with prosecutors around force-related allegations.

144. Plaintiff alleges Martin is relevant here not as conclusive proof of every fact alleged there, but as public context showing that selective, prosecutor-facing handling of force and credibility issues under this same Sheriff's administration is plausible rather than fanciful. Plaintiff further alleges that the significance of Martin lies in the alleged mechanics of non-neutral accountability: altered internal-affairs staffing, retaliatory assignment of investigators, manipulated review structures, special-prosecutor referral, public dissemination, and coordinated prosecutor-facing use of force and credibility allegations.

145. Plaintiff further alleges that Martin is especially relevant because the underlying allegations there involved serious force and reporting-integrity issues, including unnecessary pepper spray, unnecessary tasing, and a report allegedly inconsistent with body-camera footage. The same public record also described an unsigned Brady / Giglio disclosure that appeared to be a template, with blanks for prosecutor, defendant, and cause number, and broad dissemination of those allegations in dozens of criminal cases. Plaintiff alleges that those facts support the inference of a repeatable institutional mechanism for processing force and credibility issues through reusable paperwork and prosecutor-facing channels, rather than a one-off or purely improvised response.

146. Plaintiff does not allege that Martin, standing alone, proves beyond doubt that department-wide unchecked excessive force exists. Plaintiff alleges instead the narrower and legally more defensible inference that Martin reveals a selective-enforcement and biased-accountability problem: if a politically disfavored officer could be exposed through manipulated internal review, reusable disclosure mechanisms, and coordinated prosecutor-facing processes, then similar force or credibility problems involving other officers were not necessarily handled the same way. Plaintiff further alleges that selective exposure logically implies a comparison group and supports a plausible inference that force and reporting misconduct could be tolerated, insufficiently investigated, minimized, absorbed, or papered over for favored insiders while exposed or weaponized when politically useful.

147. Plaintiff further alleges that this complaint does not rest on any free-standing constitutional right to an investigation. Rather, Plaintiff alleges that repeated public red flags concerning force, reporting integrity, internal-review manipulation, and prosecutor-facing disclosure practices can plausibly create notice and support deliberate indifference, custom, ratification, and policymaker-directed misuse of official processes when tied to the specific constitutional injuries

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alleged here. Plaintiff further alleges that, although deliberate indifference ordinarily requires notice through similar constitutional violations, the repeated red flags described here are relevant because they plausibly put policymakers on notice of force-and-reporting risks and of a structurally compromised accountability system. See *Connick v. Thompson*, 563 U.S. 51, 62 (2011).

148. Plaintiff further alleges that public litigation involving Tippecanoe governmental corrections operations reinforces that force controversies paired with contested reporting are not fanciful in this county ecosystem. In *Ambers v. Tippecanoe County*, a plaintiff alleged severe force by a corrections officer and further alleged that officers made factual errors and / or omissions in incident reports to cover up the force. Plaintiff offers Ambers, like Martin, not as conclusive proof of every allegation in that case, but as additional public context making it more plausible that force controversies and report-integrity disputes are recurring red flags within Tippecanoe law-enforcement / corrections operations rather than wholly isolated anomalies.

149. Plaintiff further alleges that, taken together, Martin, Ambers, and Plaintiff's own case constitute at least three distinct public red-flag clusters in the same Tippecanoe law-enforcement / corrections ecosystem involving force together with reporting-integrity concerns. Plaintiff does not rely on the mere number of complaints filed, which without more would prove little. See *Strauss v. City of Chicago*, 760 F.2d 765, 768-69 (7th Cir. 1985). Plaintiff alleges the significance lies instead in the combination of recurring force-and-reporting controversies, a reusable prosecutor-facing disclosure mechanism, and the standardized review-and-forward process shown in Plaintiff's own incident file, which together make it more plausible that force-related misconduct and narrative-management problems were not isolated anomalies and that policymakers had reason to know of recurring constitutional risk.

150. Taken together with the internal contradictions, self-review, CAD / RMS irregularities, generic affidavit, and prosecutor-forwarding steps in Plaintiff's own incident file, Martin and Ambers make it more plausible that the Sheriff's Office operated a selective-enforcement and narrative-management regime rather than a genuinely neutral anti-excessive-force regime. Because Sheriff Goldsmith is the final policymaker for TCSO's use-of-force review, internal report approval, records-control practices, and sheriff-office referral practices, Plaintiff further alleges that municipal liability may arise here not only from a widespread custom, but also from policymaker-directed or policymaker-ratified misuse of those official processes in this case.

151. These policies, customs, practices, and policymaker-approved methods were the moving force behind: (a) the warrantless rear-curtilage search posture; (b) the excessive K9 force; (c) the continued arrest and detention after misidentification became apparent; and (d) the delayed prosecution initiated and maintained through a report-review and forward-to-prosecutor process that adopted officer narratives rather than independently testing them.

152. The full mechanics and breadth of the Sheriff's Office review-and-forwarding system, the handling of CAD / RMS status fields and audit records, the use of standardized disclosure or

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affidavit templates, and the existence of comparable incident packages are uniquely within Defendants' possession and control.

**COUNT VI – Indiana Battery
(Against Sliger)**

153. Plaintiff incorporates paragraphs 48 through 58.

154. Defendant Sliger intentionally caused harmful and offensive contact by deploying a police K9 to bite Plaintiff.

155. The force used against Plaintiff was not justified by Indiana Code § 35-41-3-3 because, as alleged above, the force was unnecessary and excessive once Defendants lacked a reliable basis to continue treating Plaintiff as Tanner.

156. The contact caused injury and damages.

**COUNT VII – Indiana Trespass
(Against Sliger, Farrell, Dornon, and Loop)**

157. Plaintiff incorporates paragraphs 15 through 33.

158. Defendants intentionally entered and / or occupied the enclosed curtilage at the Residence without lawful right, warrant, or consent.

159. The entry exceeded any limited implied license associated with approaching a home and invaded private areas used for domestic activity.

160. Plaintiff suffered damages, including invasion of privacy and escalation to physical injury.

VI. PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that the Court:

- A. Enter judgment in Plaintiff's favor on all surviving counts;
- B. Award compensatory damages in an amount to be determined by a jury;
- C. Award nominal damages for constitutional violations;
- D. Award punitive damages against the individual-capacity Defendants where permitted by law;
- E. Award costs under 42 U.S.C. § 1988 and other applicable authority, and reasonable attorney's fees if Plaintiff later retains counsel and is otherwise eligible;
- F. Award pre- and post-judgment interest as allowed by law; and
- G. Grant such other and further relief as the Court deems just and proper.

VII. JURY DEMAND

Plaintiff demands a trial by jury on all issues so triable.

DATED:

[Signature] 3-12-26